



January 8, 2016

Reference No. 038443-12

Ms. Jenny Davison
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Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
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Dear Ms. Davison and Mr. Renninger:

**Re: Progress Report: December 1 through 31, 2015
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAO) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAO), and the ASAO for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAO), for the period of December 1 through 31, 2015.

The next Progress Report for the month of January 2016 will be submitted on or before February 10, 2016.

Significant Developments in this Reporting Period

RI/FS ASAO Developments

There were no RI/FS ASAO Developments in December 2015.

Removal Action ASAO Developments

On December 2, 2015, GHD provided USEPA with a revised memorandum summarizing the July 2015 Vapor Intrusion (VI) analytical results and proposed sub-slab depressurization system (SSDS) modifications. The memorandum was revised to include secondary sub-slab screening levels, as proposed by USEPA in September 2015, and revised in November 2015 using an attenuation

factor (AF) of 33 to match the Office of Solid Waste and Emergency Response (OSWER) 2015 Final VI Guidance.

On December 7, 2015, GHD notified USEPA that the owner and property management company, Mark Fornes Realty, which represent four of the six tenants with SSDSs in the buildings (Overstreet Painting and S&J Precision in Building 12, NexGen Vending in Building 14, and SIM Trainer in Building 15) were not available for the proposed December 16 and 17, 2015, meeting dates and proposed to reschedule the meetings for January 2016.

On December 10, 2015, GHD notified USEPA that VI meetings were scheduled for December 17, 2015 with two of the six owners/tenants with SSDSs in the buildings (B&G Equipment and Truck Repair [B&G Trucking] in Buildings 8 & 9 and Globe Equipment in Building 24). GHD also provided USEPA with memoranda summarizing vapor intrusion sampling results at Buildings 8, 9, and 24. USEPA confirmed the December 17, 2015 meeting date and times.

On December 15, 2015, GHD notified USEPA that Revision 1 of the VI Mitigation Work Plan for South Dayton Dump and Landfill Site had been uploaded to the FTP Site and also provided a link to download the report.

On December 17, 2015, USEPA, Public Health-Dayton & Montgomery County (PHDMC), GHD, and owners of B&G Trucking and Globe Equipment participated in two on-Site meetings regarding the status of vapor intrusion mitigation at Buildings 8 and 9 (B&G Trucking) and Building 24 (Globe Equipment).

During the December 17th meeting at Buildings 8 and 9 (B&G Trucking), the participants discussed the following topics:

- USEPA described the reason for the meeting, explained roles of each representative; and discussed the causes and concerns resulting from vapor intrusion.
- GHD distributed sample result letters to Bruce Mangeot, owner, and David Girard, VP and explained contents of the letter for each building and with additional input from USEPA.
- USEPA and GHD stated that there is no evidence that indoor air levels are a concern yet modifications are proposed to improve the vacuum and depressurization of the sub-slab to further draw VI contamination away from the buildings and decrease SS concentration levels.
- GHD explained planned next steps which involve SSDS modifications, testing 60 days afterwards, quarterly SSDS checks and annual monitoring.
- All parties were involved with a tour of the facilities to evaluate, discuss and agree on the proposed locations of additional extraction points and stemlines. The following revisions to the proposed SSDS modifications in Buildings 8 and 9 were noted:
 - Proposed Building 8 locations of EP-5 and the EP-5 stemline were moved from the location adjacent to the truck bay, a high traffic area, to the other side of the wall/partition, where less activity occurs.
 - Proposed Building 8 location of the EP-3 stemline 2 was extended past the electric meters, to the corner of the building to avoid any existing obstructions present along the wall.

- Proposed Building 9 location of the EP-2 stemline will be installed past the 2nd red hose reel, to be confirmed by Environmental Doctor.
- Proposed Building 9 location of EP-3 was modified to be installed in between the two middle windows on the west wall of the building.
- GHD discuss space requirements for valves and barbs on all extraction – B&G Trucking personnel requested that Environmental Doctor and Greg Lewis of GHD complete a site visit before January 7, 2016 to determine the feasibility of installation in the newly proposed locations and requested that Environmental Doctor bring the hardware (piping, valves, barbs) to the visit in order to see how much floor space or space from the building walls is required.

During the December 17th meeting at Building 24 (Globe Equipment), the participants discussed the following topics:

- USEPA described reason for meeting, explained roles of each representative; and discussed the causes of and concerns resulting from vapor intrusion.
- GHD distributed sample result letters to Hilton Garner, owner, and Kevin Wogoman, Controller and explained contents of the letter, with additional input from USEPA.
- All parties were involved with a tour of the facilities to evaluate, discuss and agree on the proposed location of an additional stemline. The following revisions to the proposed SSDS modifications in Buildings 24 (Globe Equipment) were noted:
 - EP-8 stemline 2 was extended closer to SS-24-B, which requires piping to run overhead to avoid any interferences with the traffic passing through the oversized doorway.
 - EP-8 stemline 2 addition will require bumper protection, similar to the yellow protective guards present in B&G Trucking.
 - Globe Equipment accepted GHD's proposal for Environmental Doctor and Greg Lewis to complete a site visit to determine the feasibility of the stemline addition.

As of December 31, 2015, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- 2015 indoor air (IA) and/or SS soil vapor sampling were completed on February 17, July 15, and October 6, 2015:
 - Trichloroethene concentration in SS soil vapor samples collected from probes SS-8-A and SS-8-B were greater than ODH screening level (AF of 33). GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations from IA locations IA-8-A and IA-8-D were less than ODH screening levels. Benzene concentration from IA location IA-8-F was greater than the ODH screening level in the July 2015 sampling round. Available evidence suggests IA benzene

- concentrations are the result of ongoing daily human activities within and around Building 8 as well as IA background sources, and are not the result of a complete VI pathway.
- The fan at extraction point EP-3 was not operating during the majority of the July 2015 sampling round and was replaced late in the day on July 15, 2015.
- The fans at extraction points EP-1 and EP-2 were not operating on September 29, 2015 and were replaced on October 1, 2015.
- All fans were operational during the October 2015 sampling round.
- GHD and USEPA proposed SSDS modifications to the building owner during the December 2015 on-Site VI meeting. GHD and Environmental Doctor will complete a site visit on January 5, 2016, to determine the feasibility of installation for the newly proposed SSDS modifications, as requested by the building owner.

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 17, and July 15, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - Benzene and xylenes were not detected in Building 9 during the July 2015 sampling round.
- GHD and USEPA proposed SSDS modifications to the building owner during the December 2015 on-Site VI meeting. The building owner accepted GHD's proposal to allow Environmental Doctor and GHD to complete a site visit to determine the feasibility of the proposed SSDS modifications.

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, and July 13, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Respondents and USEPA will propose SSDS modifications to the building owner.

Building 14 (Bullseye Amusements):

- ❑ 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.
- ❑ Two rounds of 2015 IA and SS soil vapor sampling completed on February 19, and July 16, 2015.
- ❑ The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- ❑ Annual proficiency sampling will be completed in July 2016.

Building 15 (SIM Trainer):

- ❑ 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- ❑ Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, and July 14, 2015.
- ❑ July 2015 TCE SS concentration at SS-15-C was greater than the ODH SS screening level (AF of 33).
- ❑ IA concentrations are less than ODH IA screening levels.
- ❑ Respondents and USEPA will propose SSDS modifications to the building owner.

Building 17 (Megacity Construction):

- ❑ 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- ❑ 1-year proficiency sampling completed on February 19, 2015.
- ❑ The building is in compliance.
- ❑ Annual proficiency sampling will be completed in February 2016.

Building 24 (Globe Equipment):

- ❑ 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- ❑ One-year confirmatory sampling completed on February 20, 2015.
- ❑ Additional confirmatory sampling completed on July 16, 2015.
- ❑ The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- ❑ Respondents and USEPA will propose SSDS modifications to the building owner to improve SS vacuum.
- ❑ Annual proficiency sampling will be completed in February 2016.

Summaries of all Anticipated Problems and Planned Resolutions

As previously discussed with USEPA, a number of the owners and tenants in buildings planned for vapor mitigation have expressed concerns regarding the intrusion that the VI sampling and mitigation has had, and will have, on their business. The owners of the buildings (i.e., South Dayton Remediation Trust) refused to allow additional work to occur. On October 24, 2014, the Respondents transmitted letters to the owners and tenants of the buildings with remaining sub-slab issues providing the analytical results for sampling completed to date and seeking their consent to cease intrusive vapor abatement activities and transition to an enhanced indoor air monitoring program. In January 2015, the legal counsel for the owners provided written notification that the owners and tenants agree to allow indoor air monitoring to proceed but were not willing to allow further remedial work. In September 2015, USEPA and GHD met with owners and tenants and informally discussed the potential for further remedial work. In December 2015 meetings were conducted with owner/tenants at two locations; additional discussions are pending.

Projected Work for the Next Reporting Period

- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.
- Discussions regarding proposed SSDS modifications at Overstreet Painting and S&J Precision in Building 12, NexGen Vending in Building 14, and SIM Trainer in Building 15 will be completed during on-site VI meetings in January 2016 subject to availability of the owner representatives.
- The Respondents will review and respond to the USEPA response to the Good Faith Offer letter and comments on the new ASAOC and SOW.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/7

Encl.

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